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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12 In re
13 META MATERIALS INC.,
14 Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**FIRST AMENDED DECLARATION OF
JAMES W. CHRISTIAN IN SUPPORT OF
APPLICATION BY CHAPTER 7
TRUSTEE TO EMPLOY THE LAW FIRM
OF CHRISTIAN ATTAR AS SPECIAL
COUNSEL [F.R.BANKR.P. 2014]**

Hearing Date: N/A
Hearing Time:

15 James W. Christian, under penalty of perjury of the laws of the United States, declares:

16 1. I am a resident of Texas, and I am a member in good standing with the State Bar of
17 Texas since 1978. My C.V. is attached hereto as Exhibit "A".

18 2. I have personal knowledge of the matters stated herein.

19 3. I am the senior partner in the law firm of Christian Attar ("Christian Attar"), located
20 in Houston, Texas. Christian Attar does not hold any interest adverse to the Meta Materials, Inc.
21 chapter 7 estate ("Estate"), or any of its related subsidiaries.

22 4. To the best of my knowledge, there are no connections which Christian Attar,
23 and/or any of its employees, have with the Estate's creditors, shareholder or other parties-in-
24 interest and their respective attorneys and accountants, the United States Trustee, and any person
25 employed in the office of the United States Trustee, related to this matter.
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5. Since my Declaration executed on October 31, 2024, [ECF No. 99], I was asked by Next Bridge Hydrocarbon, Inc. (“Next Bridge”) to defend it against numerous pro se lawsuits filed in the Western District of Texas (the “Pro Se Cases”). A list of the Pro Se Cases are as follows:

- Case No. 24-cv-00317-DC-RG *Contique Willcot v. Securities and Exchange Commission, et al*; In the United States District Court Western District of Texas Midland-Odessa Division
- Case No. 7:24-CV-321-DC-RCG; *Danielle Spears v. Next Bridge Hydrocarbons, Inc., et al*; In the United States District Court Western District of Texas Midland-Odessa Division
- Case No. 7:24-CV-322; *Matthew J. Pease v. Securities & Exchange Commission, et al*; In the United States District Court for the District of Western Texas

6. In addition, the same group of collective pro se plaintiffs have filed numerous other pro se lawsuits (the Other Pro Se Lawsuits) in which Christian Attar is not involved. The point being it is important for the Court to understand the scope and intent of what the pro se plaintiffs have done to harm Meta. Some of the Other Pro Se Lawsuits have been filed but not served. *See* Exhibit “B” attached hereto.

7. It is my belief that the Pro Se Cases and the Other Pro Se Lawsuits are a coordinated effort to obstruct the efforts of the Bankruptcy Estate to hold accountable all parties who previously manipulated the securities of Meta Materials, Inc. (“Meta”). This includes many of the Pro Se Cases suing former officers and/or directors of Meta.¹

8. The full factual analysis that act as a basis of my belief that the Pro Se Cases are a coordinated effort, is more fully set forth in my letter to Trustee’s counsel, Jeffrey Hartman dated April 16, 2025, attached as Exhibit “D” (including all exhibits therein) (hereinafter the “Letter”).

¹ Note that in some Pro Se Cases notice of bankruptcy has been filed due to the automatic stay in place. *See* Exhibit “C” attached hereto.

11. The New Case will be on behalf of Next Bridge only and has nothing to do with, and is in no way related to Meta, the Bankruptcy Estate or otherwise.

13. Accordingly, once the New Case is filed on behalf of Next Bridge, Christian Attar will still remain disinterested persons (within the meaning of 11 U.S.C. § 101(14) and 327 and 328).

CHRISTIAN ATTAR

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